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Attorneys for Plaintiff,
GEORGIA-PACIFIC CONSUMER PRODUCTS LP

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

GEORGIA-PACIFIC CONSUMER
PRODUCTS LP, a Delaware limited
partnership,

Plaintiff,

v.

LEE'S GENERAL TOYS, INC., a California
corporation, JOHN LEE, an individual; and
DOES 1-100,

Defendants.

Civil Action No. 07-CV-02391 JAH (POR)

DECLARATION OF ZHIJUN XU

1 I, ZHIJUN XU, hereby declare as follows:

2 1. I am the Director of the Intellectual Property Division of Shanghai Asia
3 Information Associates Limited Consultants ("AIAL"). I have personal knowledge of the
4 matters set forth below and could and would testify competently thereto if necessary.

5 2. Our company is an affiliate of the law firm of Baker & McKenzie, and I am
6 responsible for supervising investigation work instructed by Baker & McKenzie lawyers and
7 their clients.

8 3. I received instructions on January 04 and 9, 2008 to investigate the following
9 companies in particular to confirm reports that they have previously engaged in the production
10 and/or export of paper products bearing the "ANGEL" trademark:

11 A. Zhongshan Runhui Paper Co. Ltd. (Chinese name: 中山市润晖纸业有限公司);

12 B. Shantou Kid Toys Co. Ltd (Chinese name: 汕头市启迪玩具有限公司);

13 C. Fook Woo Assorted Paper Co. Ltd. (Chinese name: 惠州福和纸业有限公司);

14 D. Zhongshan Sanjiao Paper Manufacturing Co. Ltd. (Chinese name: 中山市三角纸品
15 制造有限公司)

16 E. Zhongshan Zhongshun Paper Group (Chinese name: 广东中顺纸业集团有限公司)

17 **A) Zhongshan Runhui Paper Co. Ltd.**

18 4. On January 04, 2008, a member of my staff telephoned Zhongshan Runhui Paper
19 Co. Ltd. ("Runhui") and spoke with a Ms. Li (Chinese surname: 李).

20 a) Ms. Li said that Runhui had produced "Angel" branded toilet paper for export to
21 the United States.

22 b) She also acknowledged that "Angel" was a famous brand in the United States.

23 c) She added that her company could produce "Angel" toilet paper again, but
24 production would be "dangerous".

25 **B) Shantou Kid Toys Co. Ltd**

26 5. On January 04, 2008, a member of my staff telephoned Shantou Kid Toys Co.
27 Ltd. ("Shantou Kid Toys") and spoke with a man named Lin Hui Zhong (Chinese name: 林惠
28 忠) who represented himself as a manager at Shantou Kid Toys.

- 1 a) Lin said that Shantou Kid Toys export various products to the Middle East and
- 2 the United States.
- 3 b) Lin said that Shantou Kid Toys did not produce toilet paper; however, Shantou
- 4 Kid Toys could work with a 'partner' to provide toilet paper.
- 5 c) Lin said that Shantou Kid Toys previously partnered with Fook Woo Assorted
- 6 Paper Co. Ltd., Zhongshan Runhui Paper Co. Ltd. and Zhongshan Sanjiao Paper
- 7 Manufacturing Co. Ltd.
- 8 d) When asked whether Shantou Kid Toys provided "Angel" branded toilet paper,
- 9 Lin said that someone may have asked Shantou Kid Toys to export "Angel"
- 10 branded toilet paper previously, but he could not recall precisely.
- 11 6. On February 13, 2008, a member of my staff spoke to Mr. Lin again. This time
- 12 Lin admitted to being aware of the "Angel Soft" branded toilet paper in the
- 13 United States and said that he previously exported "Angel Lite" product to the
- 14 United States.
- 15
- 16 **C) Fook Woo Assorted Paper Co. Ltd.**
- 17 7. On January 11, 2008, a member of my staff visited the factory of Fook Woo
- 18 Assorted Paper Co. Ltd. ("Fook Woo") at the following address: Lian Wu Management District,
- 19 Yuan Zhou Town, Bo Luo, Guangdong (address in Chinese is: 广东省博罗县园洲镇梁屋管理
- 20 区). He found the following:
- 21 a) Fook Woo's factory exhibited twelve packages of toilet paper bearing the
- 22 "Angel" mark at its premises.
- 23 b) A Fook Woo representative, Lin Wuyan (Chinese name: 林妩燕), stated to the
- 24 investigator that Fook Woo produced "Angel"-branded toilet paper, using
- 25 recycled paper.
- 26 c) Mr. Lin stated that Fook Woo's monthly production of "Angel" toilet paper was
- 27 80 containers (around 49,000 rolls per container).
- 28 d) The destinations of the "Angel" branded toilet paper were Los Angeles and Long

1 Beach.

2 e) The company usually obtained raw materials from Runhui.

3 f) The investigator took a picture of Lin Wuyan's business card (**Exhibit 1**).

4
5 **D. Zhongshan Sanjiao Paper Manufacturing Co. Ltd.**

6 8. On January 10, 2008, a member of my staff visited the factory of Zhongshan
7 Sanjiao Paper Manufacturing Co. Ltd. ("Sanjiao") at the following address: Ai Guo Industry
8 District, Triangle Town, Zhong Shan City (Address in Chinese:中山市三角镇爱国工业区). He
9 found the following.

10 a) An unnamed Sanjiao representative said that Sanjiao had produced the "Angel"
11 branded toilet paper for two years.

12 b) The same representative stated that Sanjiao's factory currently possessed two
13 hundred containers of toilet paper bearing the "Angel" mark.

14 c) A photograph of the "Angel" branded toilet paper was taken at the Sanjiao's
15 factory (**Exhibit 2**).

16 **E. Zhongshan Zhongshun Paper Group**

17 On January 10, 2008, a member of my staff visited the factory of Zhongshan Zhongshun Paper
18 Group ("Zhongshun") at the following address: Sha Lang High-Tech Development District,
19 West District, Zhongshan City(Address in Chinese:中山西区沙朗高科技开发区). He found
20 the following.

21 a) Zhongshun's factory displayed three sample rolls of "Angel" branded toilet
22 paper.

23 b) A Zhongshun representative named Dai Mo Yi (Chinese name: 代莱义) stated to
24 the investigator that the company manufactured "Angel" branded toilet paper for
25 an unnamed American customer.

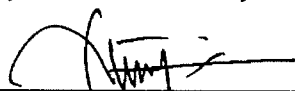
26 c) Dai Mo Yi further stated that Zhongshun could produce more "Angel" branded
27 toilet paper upon receiving orders to do so.

28 d) The investigator took the photos of the "Angel" branded toilet paper at

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Zhongshun's factory and of Dai Mo Yi's business card (Exhibits 3 and 4).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed by me on this 14th day of February 2008.



Zhijun Xu

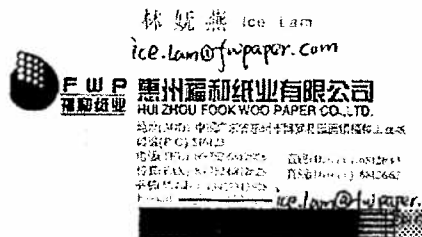
EXHIBIT 1

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EXHIBITS FOR DECLARATION OF ZHIJUN XU

EXHIBIT 1

Photo taken at factory of Fook Woo Assorted Paper Co. Ltd. (Chinese name: 惠州福和纸业有限公司). Lin Wuyan's business card.



Signature of Zhijun Xu

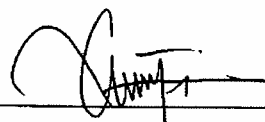
EXHIBIT 2

Civil Action No. 07-CV-02390 JAH POR

EXHIBITS FOR DECLARATION OF ZHIJUN XU

EXHIBIT 2

Photo taken at Zhongshan Sanjiao Paper Manufacturing Co. Ltd. (Chinese name: 中山市三角纸品制造有限公司). "Angel" branded toilet paper.



Signature of Zhijun Xu

EXHIBITS 3 AND 4

EXHIBITS 3 AND 4

Photos taken at Zhongshan Zhongshun Paper Group (Chinese Name: 广东中顺纸业集团有限公司). "Angel" branded toilet paper and Dai Mo Yi's business card.

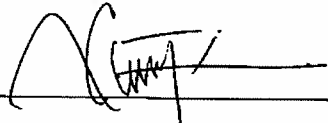
CNSN 中国

代表义

101' 广交会摊位号: 21, 21.28

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Signature of Zhijun Xu